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UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

PATRICIA J. COVEY-HINZO, individually  
and as successor in interest to GILBERT E.  
HINZO, Deceased, ALEX HINZO, an  
individual, and FELICIA WATSON, an  
individual,

Case No. C 15-00241 WHA (Lead Case)

**AMENDED JOINT STIPULATION AND  
~~[PROPOSED]~~ ORDER TO CONTINUE  
EXPERT REPORT DEADLINES**

Plaintiffs,

v.

ASBESTOS DEFENDANTS et al.

Defendants

WHEREAS, the Court's March 27, 2015 Scheduling Order provides for a briefing schedule on expert reports as follows:

1. The last date for designation of expert testimony and disclosure of full expert reports under FRCP 26(a)(2) as to any issue on which a party has the burden of proof ("opening reports") shall be DECEMBER 18, 2015.

2. Within **FOURTEEN CALENDAR DAYS** of said deadline, all other parties must disclose any expert reports on the same issue ("opposition reports")

3. Within **SEVEN CALENDAR DAYS** thereafter, the party with the burden of proof must

1 disclose any reply reports rebutting specific material in opposition reports ("rebuttal reports").

2       4. The cutoff for all expert discovery shall be FOURTEEN CALENDAR DAYS after  
3 the deadline for reply reports.

4       WHEREAS, pursuant to the Court's March 27, 2015 scheduling order, non-expert discovery  
5 closes on December 18, 2015;

6       WHEREAS, Plaintiffs first identified the only known witness with information about  
7 Decedent's work history on November 12, 2015;

8       WHEREAS, the deposition of this witness has been noticed for December 8, 2015;

9       WHEREAS, the parties have agreed that the late timing of the disclosures of the only  
10 potential product identification witness will make it impracticable for the parties to adhere to the  
11 Court's expert report deadlines.

12       WHEREAS on November 30, 2015 this Court entered an Order based on a Stipulation that  
13 incorrectly called for the expert report deadlines to be continued to January 7, 2015 rather than 2016.

14       WHEREAS with the exception of the corrected date for the expert report deadlines, this  
15 Stipulation and Proposed Order is substantively the same as that filed with this Court on November  
16 25, 2015.

17       IT IS HEREBY STIPULATED AND AGREED that the deadline for designation of expert  
18 testimony and disclosure of full expert reports under FRCP 26(a)(2) as to any issue on which a party  
19 has the burden of proof ("opening reports") shall be continued to January 7, 2016. All other  
20 deadlines in the Court's scheduling order shall remain in place.

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Morgan Lewis & Bockius LLP

2 Dated: November 30, 2015

By: /s/ Joseph Duffy

Joseph Duffy  
Attorneys for Defendant  
ITT Corporation

5 McKenna, Long & Aldridge

6 Dated: November 30, 2015

7 By: /s/ Lisa Oberg

Lisa Oberg  
Attorneys for Defendant  
Metalclad Insulation LLC

9 Steptoe and Johnson LLP

10 Dated: November 30, 2015

11 By: /s/ Lisa Marie Dowling

Lisa Marie Dowling  
Attorneys for Defendant  
Metropolitan Life Insurance Company

13 The Davis Law Firm

14 Dated: November 30, 2015

15 By: /s/ Whitney Davis

Whitney Davis  
Attorneys for Defendant  
Viad Corporation

17 Tucker Ellis LLP

18 Dated: November 30, 2015

19 By: /s/ James Cunningham

James Cunningham  
Attorneys for Defendant  
Warren Pumps, LLC

22 Pond North LLP

23 Dated: November 30, 2015

24 By: /s/ Frank Pond

Frank Pond  
Attorneys for Defendants  
CBS Corporation, a Delaware corporation  
f/k/a Viacom, Inc., successor by merger to  
CBS Corporation, a Pennsylvania  
corporation, f/k/a Westinghouse Electric  
Corporation; and FMC Corporation on behalf  
of its former Northern Pump business

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Dated: November 30, 2015

By: /s/ Sara Morton

Sara Morton  
Attorneys for Plaintiffs

1           **PURSUANT TO STIPULATION**, the deadline for designation of expert testimony and  
2 disclosure of full expert reports under FRCP 26(a)(2) as to any issue on which a party has the burden  
3 of proof (“opening reports”) shall be continued to January 7, 2016. All other deadlines in this Court’s  
4 scheduling order shall remain in place.

5           **IT IS SO ORDERED.**

6  
7 Dated: November 30, 2015.

  
Honorable William Alsup  
Judge, United States District Court  
Northern District of California

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